STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

April 23, 2012

Mr. Gordon Crane
US Navy, Naval Construction Battalion Center
5200 CBC 2nd Street
Gulfport, MS 39501

Dear Mr. Crane:

Re: Inspection Report
US Navy, Naval Construction Battalion Center
Gulfport, Mississippi
Harrison County
GP-MS4 Coverage No. MSRMS4036

Enclosed is a copy of the compliance evaluation inspection report completed as a result of this office's inspection at US Navy, Naval Construction Battalion Center on November 30, 2011. The report should be used by you as a guide for complying with requirements and limitations stated in your permit.

If you have any questions concerning this matter, please contact me at (601) 961-5149.

Sincerely,

Mandy Case

Mandy Case
Municipal and Private Facilities Branch
Environmental Compliance and Enforcement Division

Agency Interest No. 3290
INS20110001

Mississippi Department of Environmental Quality
Office of Pollution Control
Water Compliance Inspection Report

Site Name: US Navy, Naval Construction Battalion Center

Permit Number(s): MSRMS4036

Physical Address
5200 CBC
2nd Street Code 17
Gulfport, MS 395015001
Harrison County

Mailing Address
2401 Upper Nixon Avenue
B322
Gulfport, Mississippi 39501-5001

Evaluation Type: Compliance Evaluation Inspection - NPDES

Date of Evaluation: 11/30/2011

Facility Type: Industrial

Inspection Participants: Mandy Case, MDEQ
Kathy Gaynor, NCBC

Purpose of Inspection
To determine the Naval Construction Battalion Center's (NCBC) compliance status with its NPDES Storm Water permit.

Permit Status
The NCBC was granted coverage under Mississippi's Small Municipal Separate Storm Sewer System (MS4) Storm Water General NPDES Permit, issued on January 5, 2009. The permit is set to expire on December 31, 2013. The City's new 5-year storm water management plan has been submitted and approved for coverage by MDEQ on November 6, 2009.

Facility Description
The NCBC is covered under Mississippi's Small Municipal Separate Storm Sewer System (MS4) Storm Water General NPDES Permit in order to discharge storm water from small storm sewer systems, owned and operated by the NCBC MS4 Storm Water Management Program, into receiving streams of the Long Beach Canal, Brickyard Bayou, and Long Beach Bayou in Harrison County.

Inspection Summary
On November 30, 2011, I met with representatives of the NCBC to evaluate the compliance status of the facility's MS4 Storm Water permit. A records review was conducted, along with field observations. A review of the Storm Water Management Program (SWMP) for the year 2009- present was performed. Required documentation of compliance with its measurable goals as outlined in the SWMP was produced. After

review of the program's Best Management Practices (BMPs) and a review of the facility's Annual SWMP Report, submitted on January 26, 2011, our office noted the following:

Public Education and Outreach

Measurable Goal: Include articles in the Seabee Courier addressing storm water pollution. During 2010, articles were published on 3/25/10 and 11/4/10. Articles are also published throughout the year to promote storm water events such as "Renew the Rivers" and "National Beach Clean-up" events. Articles on household hazardous wastes and the dumping and draining of grease were also published in the December 2011 issue. The article addressing the draining and dumping of household grease was a result of an illicit discharge of grease during a base event during the summer. This is a great example of using public education and outreach tools to address noted problems.

Measurable Goal: Provide storm water pollution prevention education material via the base's website.

The website is active and contains information on storm water. By typing in storm water on the site's search engine, numerous links and articles can be accessed. Information ranges from newspaper articles to spill prevention plans to construction field manuals.

Measurable Goal: Integrate storm water quality information into quarterly training.

Training dates were provided for both 2010 and 2011. Training is done monthly for new employees on general environmental topics. A copy of the power point presentation used for training was on file. Environmental Management System training is also given. This training provides more specific information, including hazardous waste information. The base has plans to also incorporate training into safety meetings.

Additional public education on the base included the marking of approximately 150 storm drains with the message "Don't Pollute – flows to waterways." In May of 2011, approximately 100 door hangers were also distributed to residences on base.

Public Involvement

Measurable Goal: Post information for reporting non-storm water discharges.

This is addressed in newcomer briefings which are held monthly. Phone numbers and contact information is also provided in newspaper articles and other printed materials, as well as on the base's website.

Measurable Goal: Announcements of the Gulf Coast beach clean-up.

Participation information for this event was advertised in the Seabee Courier. Articles were also published to inform residents about "Renew the Rivers" event held in Hancock County to clean marshlands. The base supplied thirty-four workers for this event and recorded approximately 350 man-hours of service.

Illicit Discharge Detection and Elimination

Measurable Goal: Update and maintain maps of the storm sewer system.

Maps are continuously updated as needed. A current map was presented during the audit.

Measurable Goal: Track and eliminate non-storm water discharges.

Two illicit discharges were detected and eliminated during 2010. Documentation and pictures were available. During 2011, an illicit dumping of grease occurred during a base event. This was documented and also used as an outreach opportunity to inform the base residents about the consequences of illegal dumping. Additionally in 2011, two spill reports documented illicit discharges from an oil/water separator and from a secondary containment device. Thorough and detailed documentation of each event was on file.

Measurable Goal: Visually inspect all outfalls annually.

There are ten identified outfalls on the base. Dry weather field screening is now conducted by base personnel (this was previously conducted by a contractor). The form, "Storm Water Outfall Visual Monitoring Report" is used to capture information such as color, odor, clarity/turbidity, suspended solids, structural integrity, and vegetation. These inspections are performed semi-annually. Examples were provided.

Construction Site Runoff

Measurable Goal: Continue to require erosion and sediment control plans.

The base currently requires add projects >1 acre to have an erosion and sediment control plan and storm water pollution prevention plan.

Measurable Goal: Develop the tracking process.

The base maintains copies of the weekly inspection reports that are filled out by the contractor performing the construction. Base personnel also do daily inspections for additional oversight of all projects. Problems and areas of concern are noted. Inspection reports were provided during the audit.

Measurable Goal: Train construction staff.

Training was provided to construction and inspection staff by a certified outside contractor in October 2010. Additional training was held for contractors in January 2011. Training was also conducted by the base's environmental staff that included specific MS4 information.

Measurable Goal: Continue to review plans and inspect construction sites for the installation and maintenance of erosion and sediment control measures.

The process of reviewing materials prepared by the contractors is an on-going process. Base environmental staff is given the opportunity to review and comment on construction plans proposed by contractors. The contractor is responsible for submitting the necessary documentation to MDEQ for permit coverage. (Please note while this is an acceptable practice, it is the ultimate responsibility of the NCBC to ensure that proper permit coverage is obtained.)

Post-Construction Storm Water Management

Measurable Goal: Modify the existing post-construction BMP inspection program to address Phase II requirements and develop a schedule for BMP inspections.

The only post-construction BMPs are grass swales and the Seebee Lake. Routine maintenance is done by base employees. If a problem is noted, pictures are taken and reported.

During the inspection, staff accompanied me to a training field for bulldozer operation. This field experienced heavy erosion along side a ditch from the operation of the heavy machinery. Orange silt fence was installed along the area to better alert operators of the eroded area. The area was recovered by placing mesh to promote vegetative growth. Signs were also posted along the area to make operators aware of the vulnerable area.

The Seebee Lake is located on the base's golf course. While this Lake was not designed to treat storm water runoff, it does receive a large load of runoff. In order to better protect the water quality of the Lake, the base has done extensive restoration of the Lake. Bank slopes were flattened in order to increase the littoral zone around the Lake. Cypress and red maple trees were planted along the perimeter of the Lake. Additional vegetation was also added to provide an additional layer of storm water filtration. Phase II of the restoration project is planned to be completed in 2012. Phase II will include an expansion of the Phase I project to other areas of the Lake's perimeter. The base also plans to add alum and aerators to help control the algae and keep the pH levels at water quality standards.

Pollution Prevention / Good Housekeeping

Measurable Goal: Emphasize SOP information in annual training.

Training on the Spill Contingency Plan is included in the indoctrination training to new employees. These documents cover all of the sites on the base. Manuals and training material were presented for review during the audit.

Site Inspections

During the inspection of the base, I was accompanied by Ms. Gaynor, Doug Pojeky, and Nick Patry. Our first stop was at Shop C of the Construction Equipment Division. Maintenance is done inside the enclosed shop. No floor drains were in the building. Spill kits and stations were located throughout the shop. Used oil is stored and disposed of by an outside contractor. Manifests are kept on file. Oil and lube tanks all had secondary containment. Dumpsters located outside of the shop all had covers. There is a dumpster inspection program on the base. Contents of the dumpsters are monitored and sorted to ensure the proper disposal of all types of materials. Used batteries are stored in the concrete lot in enclosed containers. Inside each enclosed container is a secondary containment pallet.

Diesel and fuel tanks are double-walled in addition to being placed in secondary containment. The base recently performed maintenance on the secondary containment areas, applying sealant to address cracks in the concrete structures.

Next we inspected the north outfall (outfall #2) beside the dozer training field. There was a large vegetated buffer surrounding the outfall along with check dams in the contributing drainage ways. The next outfall inspected was at Colby and 11th street. The flowing water was clear and there were no signs of sedimentation or debris.

We then proceeded to Seebee Lake (see previous notes on this project).

Our final inspection was performed at the Battalion Maintenance Facility project. The project is under the management of JJ Sosa Contractors. First a walk through of the site was done by both base personnel and representatives from JJ Sosa Contractors. It was apparent that there was a good working relationship between base personnel and the contractors. Several examples were shown where modifications in the original storm water pollution prevention plan had to be made due to insufficient erosion and sediment control measures. In addition to erosion and sediment controls, large dumpsters were on site to discard materials. There was a dumpster for concretes, metals, wood, cardboard, and plastics. Each dumpster was labeled and either recycled or disposed of properly.

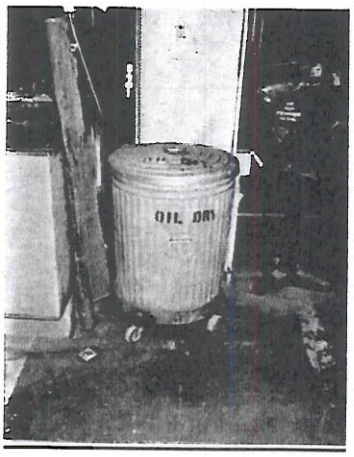
After the site visit, I was given access to all of the documentation kept on file by the contractors. In addition to the documentation required by MDEQ, there was an extensive file of very detailed documentation for every aspect of the project. It was obvious that the site was thoroughly checked at least daily during operations. Many pictures were taken to clearly show all stages of the work. Rainfall event information was also linked to each inspection.

Conclusions

Overall, the NCBC's MS4 program appeared to be well in compliance with its proposed storm water management plan. All documentation requested was readily available for review.

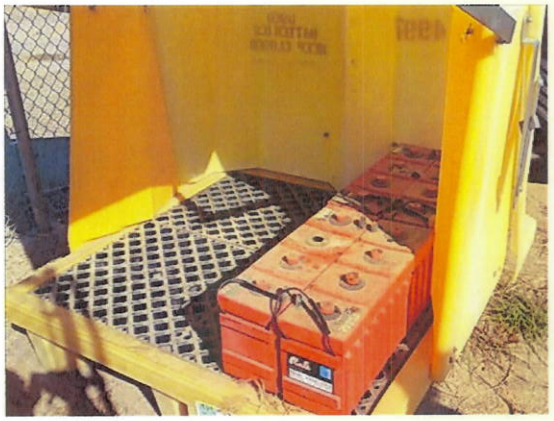
Signature: Maudy Case **Date:** 04/23/12

Photos / Other Attachments



Inside Shop C of the Construction Equipment Division, oil dry and spill kits were throughout.

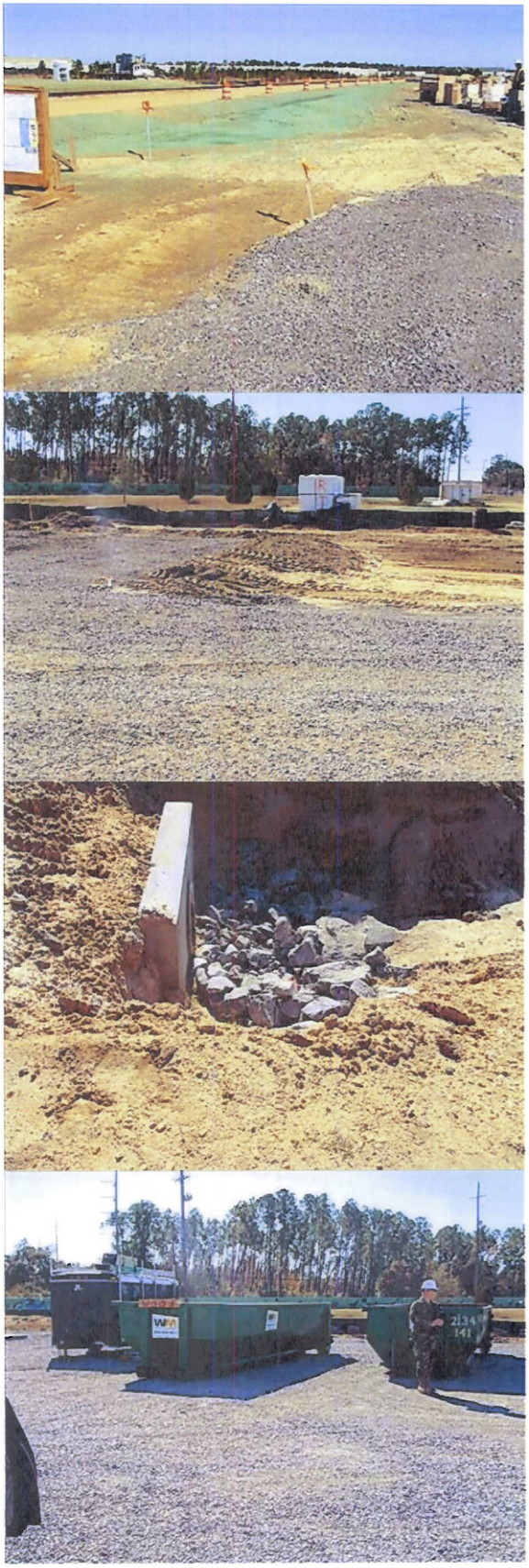
Examples of secondary containment used throughout sites on the Base



Erosion / Restoration Project at the Dozer Training Field

Outfall at Colby and 11th Streets

Seabee Lake Restoration Project



Proper Use of BMPs at the construction site of the Battalion Maintenance Facility project, including hydro-seeding for stabilization, use of coarse gravel, correctly installed silt fences, rip rap along channels, and recycle bins for construction materials. The site was in accordance with the SWPPP.